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A New Role for the Social Security Card

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The Honorable Peter W. Rodino, Jr.
Chairman, Committee on the Judiciary
House of Representatives

The Honorable Dan Rostenkowski
Chairman, Committee on Ways and Means
House of Representatives

The Honorable Joseph R. Biden, Jr.
Chairman, Committee on the Judiciary
United States Senate

The Honorable Lloyd Bentsen
Chairman, Committee on Finance
United States Senate

This report discusses the role of the social security card as part of the employer verification system under the Immigration Reform and Control Act of 1986. Also discussed is how the card's integrity can be improved.

The report, which was mandated by section 101(f) of the act, contains recommendations to the Attorney General and the Secretary of Health and Human Services. The report also identifies an issue that the Congress may wish to act upon.

We are sending copies of this report to the Attorney General, the Secretary of Health and Human Services, and the Director of the Office of Management and Budget. Copies are also being sent to the Commissioners of Social Security and the Immigration and Naturalization Service, and other interested committees and members of Congress.

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Executive Summary

Purpose

The Immigration Reform and Control Act of 1986 (IRCA) provides amnesty, under certain conditions, to illegal aliens who arrived in the United States before January 1, 1982, and to certain seasonal agricultural workers. The law also requires the nation's 7 million employers to examine certain documentation of all prospective employees (including those born in the United States) to verify their identity and eligibility to work in this country. Each year, an estimated 65 million individuals change jobs or seek employment for the first time.

The social security card is expected to be widely used to prove employment eligibility. Because of the card's key role, the law required that GAO study issues concerning the card's integrity. Specifically, GAO was asked to (1) explore ways to reduce the potential for fraudulently obtaining and using social security cards and (2) identify technological alternatives for making the card more resistant to counterfeiting.

Background

Originally, the social security number had a single use—to keep track of an individual's earnings so that social security retirement eligibility could be verified and an accurate benefit amount computed. Today, however, the number has a wide variety of uses, for example, as an identifying number on drivers' licenses and tax returns. About 300 million numbers have been issued, 210 million of which are considered active. There are 16 versions of the card in use.

Applications for numbers are processed at about 1,300 field offices of the Department of Health and Human Services' Social Security Administration (SSA). Up to the early 1970's, numbers were issued without requiring evidence of identity, age, or citizenship. Now, however, such evidence is required, and birth certificates are commonly accepted in support of an application for a card. For aliens, any of a number of documents issued by the Department of Justice's Immigration and Naturalization Service (INS) can be presented in support of an application.

Under IRCA, to prove identity to an employer, an individual may submit any of 21 documents, including a driver's license or a voter registration card. To prove employment eligibility, any of 17 documents, including a social security card, birth certificate, or 1 of 11 documents issued by INS, may be presented. Seven of these documents, including the social security card and birth certificate, are specifically authorized under the law. To comply with the law, the employer must certify that he/she has reviewed the documents and that "they appear genuine" and relate to the applicant.

IRCA also requires that the adequacy of the verification system be evaluated, and that any major change in the verification system receive congressional approval before implementation.

Results in Brief

The social security number application process is vulnerable to fraud. Thousands of different documents can be used in support of an application, making it difficult for SSA employees to be familiar with all of them. Also, support documents, especially birth certificates, can be obtained fraudulently or are easily counterfeited or altered, and there is no practical way to verify that the applicant is the person named on the document.

The same problems apply to employer verification of employment eligibility under IRCA, but more so. Unlike SSA employees, the nation's employers are largely untrained in document verification. There are too many different types of employment eligibility documents to realistically expect employers to make sound judgments on their genuineness.

The social security card can be counterfeited more easily now with the high quality color copiers being marketed. Cards issued in the future should be modified to make copies easier to detect.

Principal Findings

Social Security Cards Can Be Fraudulently Obtained and Used

There are thousands of different types of birth certificates, many of which are easily obtained, counterfeited, or altered. With such documents, persons can obtain valid social security cards. They also can present fraudulent documents to employers in lieu of a social security card as evidence of employment eligibility. SSA employees are trained to look for and detect fraudulent documents. But employers are not trained to detect altered or counterfeit social security cards and INS documents or to identify thousands of different kinds of birth certificates.

IRCA Documentation Requirements Can Be Strengthened

An option to simplify and make more realistic the verification of employment eligibility under IRCA is to designate the social security card as the only acceptable document. It should be less difficult for employers to discern the authenticity of a social security card than the many types of other documents that now can be presented. For purposes of

IRCA, such an option would have minimal impact on employers and employees because a social security number is already required of all employees for tax purposes.

Designating the social security card as the sole employment eligibility document could increase the number of requests for replacement cards by persons who no longer have their card. Because this could be costly, an estimate should be made of the number of individuals likely to need replacement cards.

Improvements Needed in Issuing Cards to Aliens

SSA's process of issuing social security cards to aliens with temporary work authorization should be revised. One option is to place expiration dates on such cards, which at present look no different than any other card.

Currently, aliens applying for a social security card can present INS documents, many of which are easily counterfeited or altered. A more simple and effective way to assign social security numbers to aliens would be for INS to complete an alien's application for a social security card and certify the alien's eligibility. INS currently does this for aliens who have applied for amnesty and need the card. Because most aliens needing social security numbers first contact INS for work authorization or other matters, such INS certification would place a minimal burden on INS, provide a convenience to aliens, and eliminate SSA's concern over the authenticity of INS documents.

Many Technologies Available to Enhance Security of Card

Magnetic stripes, integrated circuitry, and lasers are some of the additional technologies that could be applied to make the social security card more resistant to counterfeiting. However, many of these technologies are relatively costly and would not preclude persons from obtaining valid cards by using fraudulent documents.

Making future social security cards less vulnerable to new color copiers is one technology that should be considered. The Treasury Department plans to modify U.S. currency to thwart use of the copiers by counterfeiters. SSA should take similar action for new and replacement social security cards. GAO does not advocate the mass reissuance of social security cards for a number of reasons, including high administrative costs—an estimated $1.1 billion.

Financing Social Security Card Replacements

IRCA provides that any changes made to the social security card for purposes of the law be financed from general revenues. In fiscal year 1987, IRCA generated requests for an estimated 1.6 million replacement cards, whose cost—about $11.6 million—was borne by the Social Security Trust Funds.

If the Congress's intent is to eliminate or minimize the additional costs incurred by the trust funds as a result of IRCA, it may be appropriate to finance the cost of replacement cards by other means, such as appropriated funds or fees charged to requesters of replacement cards.

Recommendations

GAO recommends that the Attorney General consider reducing the number of employment eligibility documents and, specifically, making the social security card the only authorized document. If the Attorney General concludes that the number of employment eligibility documents under IRCA should be reduced, GAO also recommends that the Attorney General and the Secretary of Health and Human Services study the potential impact of such a change on requests for replacement social security cards.

GAO also recommends that the Secretary make future social security cards resistant to color copiers. GAO further recommends that the Secretary and the Attorney General develop a plan to (1) have INS verify the employment eligibility of aliens who are applying for social security cards and (2) annotate the cards for aliens authorized to work in this country on a temporary basis. GAO is also making other recommendations to the Departments of Health and Human Services and Justice.

Matters for Congressional Consideration

The Congress may wish to consider whether the IRCA-generated cost of providing replacement social security cards should be paid from appropriated funds or fees charged to those requesting such cards, rather than the Social Security Trust Funds.

Agency Comments

The Departments of Justice and Health and Human Services generally agreed with GAO's recommendations.

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Abbreviations

AFL/CIO	American Federation of Labor/Congress of Industrial Organizations
GAO	General Accounting Office
HHS	Department of Health and Human Services
INS	Immigration and Naturalization Service
IRCA	Immigration Reform and Control Act of 1986
OIG	Office of the Inspector General
PVC	polyvinyl chloride
SAVE	Systematic Alien Verification for Entitlement
SSA	Social Security Administration
SSN	social security number
USDA	U.S. Department of Agriculture

Introduction

The Immigration Reform and Control Act of 1986 (IRCA) established conditions under which an estimated 2 to 4 million illegal aliens residing in the United States could be granted amnesty and subsequent citizenship. IRCA also changed the procedures governing the entry of aliens into the country and their control while here.

A major effect of the law is that all prospective employees—whether first entering the job market or changing jobs—must present to employers evidence of their (1) identity and (2) employment eligibility. Currently, there are an estimated 7 million employers in the United States. Each year, about 65 million individuals change jobs or seek employment for the first time.

Among the documents that are acceptable evidence of employment eligibility is the social security number (SSN) card, which is expected to be widely used to comply with the law. Because of the key role of the SSN card, the Congress mandated that we study and report on issues concerning the card's integrity. We were directed to explore actions that could be taken to reduce the potential for fraudulently obtaining and using SSN cards and to identify technological alternatives for making the card more resistant to counterfeiting.

The Immigration Reform and Control Act of 1986

IRCA (Public Law 99-603), enacted November 6, 1986, provides that certain illegal aliens who have continuously resided in the United States since January 1, 1982, can apply for amnesty and subsequent citizenship. Aliens who have resided in the United States and performed seasonal agricultural services for at least 90 days during the 12-month period ending May 1, 1986, also can apply. Through January 6, 1988, about 1.2 million individuals had applied for amnesty.

The act contains other provisions aimed at better controlling the future entry of illegal aliens and assuring that employed aliens are legally authorized to work in this country. These controls are aimed at curbing the flow of illegal aliens by denying them employment, their main reason for coming to the United States.

IRCA placed certain responsibilities on employers when hiring employees. The act requires employers to verify that employees hired after November 6, 1986, are who they claim to be and that they are eligible to work in the United States. Beginning June 1, 1987, employers must complete for each employee an Employment Eligibility Verification (Form I-9), certifying that certain documents were reviewed, and retain it for at

least 3 years. A copy of the I-9 and a list of acceptable identity and employment eligibility documents appear in appendix I. These completed forms will be inspected by either the Department of Justice's Immigration and Naturalization Service (INS) or the Department of Labor during preannounced visits to employers to verify that they are complying with the requirement.

Job applicants may use any of 17 documents to establish employment eligibility. Seven of these documents are specifically authorized under IRCA:

- A U.S. passport.
- A certificate of U.S. citizenship.
- A certificate of naturalization.
- An unexpired foreign passport if the passport has an appropriate, unexpired endorsement of the Attorney General authorizing the individual to work.
- A resident alien card or alien registration card.
- An SSN card.
- A birth certificate.

The first five documents above also can be used to establish identity under the law. The other 10 employment eligibility documents—most issued by INS—have been authorized by regulation. SSN cards or birth certificates are the documents likely to be used by most people.

To prove their identity, job seekers may furnish 1 of 21 allowable documents, including a driver's license, school identification card, or voter registration card.

In signing the I-9, employers must certify that they "have examined the documents presented . . . [and] they appear to be genuine" and relate to the prospective employee. Failure to comply with these requirements can result in employer sanctions and fines. Employers are prohibited from discriminating against any individual on the basis of foreign appearance, language, or name.

IRCA mandated that the integrity of the SSN card and systems for validating its use be studied. IRCA specified that any changes proposed to the SSN card by the President as a result of the act require 1 year's advance notice and prior congressional review. Further, any costs associated with developing or implementing such a change must be paid from general revenues and not the Social Security Trust Funds. In addition, the

act states that it shall not be construed to authorize, directly or indirectly, the establishment, issuance, or use of a national identification card.

Among the studies the act required relative to the verification of employment eligibility are:

- Three annual presidential reports on the employment verification system (to be issued after the first year of implementation). Each report is to analyze the system's adequacy and describe the development and implementation of changes to the system.
- A report by the Attorney General on the potential use of a telephone verification program for determining the employment eligibility of aliens.
- A study by the Secretary of Health and Human Services (HHS) on the feasibility and cost of an SSN validation system to help employers comply with the act.

History and Uses of the SSN Card

The Social Security Act, which became law on August 14, 1935, provided for collecting taxes and paying old-age benefits based on individuals' earnings. A separate earnings account for each worker had to be maintained so that eligibility for benefits and the amount of these benefits could be correctly established at retirement. The SSN system was created to help manage these accounts by identifying employees' earnings covered by the act.

Applications for SSN cards are processed by HHS's Social Security Administration (SSA) through its network of more than 1,300 field offices. Until the early 1970's, there were no evidentiary requirements for obtaining an SSN card. Because the card's initial purpose was simply to keep track of earnings, such requirements were not considered necessary. Proof of identity was established at retirement.

Because of the increased use of the card as an identifier, to obtain a card and number an application must be submitted along with evidence of age, identity, and citizenship or alien status. Excerpts from the application, which includes the evidentiary requirements, are included as appendix II.

The SSN card contains a name and a nine-digit account number and is issued primarily to U.S. citizens and aliens authorized to work. Additionally, SSA issues nonwork SSN cards to legal aliens who are not authorized

to work. Since 1974, SSA has issued 1.8 million of these nonwork cards, primarily for banking purposes. Until May 1982, these nonwork cards looked no different than other SSN cards. Since then, however, nonwork cards contain the legend on the front "not valid for employment." About half of the 1.8 million nonwork SSN cards have this legend.

Since the introduction of the SSN in 1936, over 300 million numbers have been issued on 16 different valid versions of the paper cards. At present, about 210 million of these numbers are considered active, according to SSA, and at least 75 percent were issued without proof of the individual's identity or citizenship. About 16.7 million cards were issued in 1987, 7.9 million of which were replacements.

The advent of computerized record-keeping and legislation requiring the use of the social security card and number for various purposes has placed increasing public and commercial emphasis on the SSN as an identifier, although it was never intended to serve as such. As early as 1937, the Social Security Board (SSA's predecessor) decided that the states should use the SSN for administering state unemployment insurance programs rather than develop a new system. Use of the SSN increased significantly in 1962, when the Internal Revenue Service required its use for taxpayer identification purposes. Today, the SSN card is used for a wide variety of identification purposes—for example, in the military, to attend school, and for federal employment, hospital admittance, and eligibility for state and federal assistance.

Objectives, Scope, and Methodology

The objectives of our review were to (1) explore ways to reduce the potential for fraudulently obtaining an SSN card, (2) explore ways to reduce the potential for fraudulently using a card, and (3) identify technological alternatives for producing and issuing cards that are more resistant to counterfeiting.

While our objectives were limited to the SSN card as it would be used in administering IRCA, our review identified other related matters bearing on the effective administration and implementation of the act. Where appropriate, we have included discussions of those matters in this report, although they were not part of the legislative mandate.

To attempt to quantify the various ways persons fraudulently obtain and use the SSN card, we held discussions with HHS's Office of Inspector General (OIG), SSA, INS, and the Secret Service to learn what their prior

studies, reviews, and investigations had revealed. Such information can help identify strategies for better controlling SSN cards.

To learn how the potential for fraudulently obtaining a valid SSN from SSA might be reduced, we reviewed SSA's issuance process, which has changed dramatically over the years. A chronology of the development of the application process and controls is included in appendix III. On the basis of our past work,[1] a recently completed OIG report on the application process,[2] and discussions with SSA officials, we concluded that the most significant threat to the integrity of the card issuance process is fraudulent or invalid evidence—most commonly a birth certificate or an INS document—submitted in support of an application. Consequently, we focused on ways in which SSA can better assure itself that documents provided in support of an application are genuine and belong to the applicant.

In pursuing this objective, we observed the application process in 30 field offices in 4 SSA regions—Philadelphia, New York, Dallas, and San Francisco. These regions were selected primarily to provide a wide geographic distribution and to include areas with extensive illegal alien populations. At the offices, we interviewed the office managers and a total of 88 employees to obtain their views on the application process, their ability to detect fraudulent documents, and the adequacy of training. Also, we held discussions with the HHS OIG and SSA headquarters officials to obtain their views on ways to enhance the integrity of the SSN card application process.

To determine how to prevent individuals from fraudulently using a card, we examined ways in which cards have been so used, and we reviewed and evaluated the results of a pilot SSN verification project underway in Dallas. The project enables employers to phone SSA to verify the validity of an SSN provided by a job applicant. We also obtained information on an INS project that validates the status of aliens by checking a computerized database.

Because persons can fraudulently use someone else's valid SSN card when seeking employment, we examined options available for placing additional identifying data on the SSN card to better link the card to the

[1]Reissuing Tamper-Resistant Cards Will Not Eliminate Misuse of Social Security Numbers (HRD-81-20, Dec. 23, 1980).

[2]Controls Over the Social Security Number Application Process, May 1987 (OAI-05-86-00027).

owner. But, while such measures have potential to reduce fraudulent use, they could be viewed as creating a national identification card.

To identify alternative technologies for making the SSN card more resistant to counterfeiting, we performed literature searches and met with government and private sector representatives. Contacts within government included the Bureau of Engraving and Printing, the Government Printing Office, INS, and SSA. Among the private sector contacts were companies that are large users of various card technologies and organizations that develop or market techniques for improving card security (see app. IV). The organizations were selected on the basis of our discussions with various government officials and literature searches.

We also reviewed assessments of card technologies used or being considered by other federal agencies. These included a recent INS study to identify an appropriate technology for its alien registration cards and ongoing assessments at the Department of Transportation (to develop a secure commercial driver's license) and the Department of Defense (to develop an employee identification card). Lastly, we reviewed an assessment of a U.S. Department of Agriculture (USDA) project designed to develop a card for peanut farmers to enable the government to better account for subsidies provided.

We did not validate the cost of the card technologies discussed in this report—the data contained in the report are based on discussions with vendors—nor did we validate the claims made about performance. Further, nothing in this report should be construed as our endorsement of any particular product, service, or technology.

Comments on a draft of this report were solicited from HHS and the Department of Justice. Their comments were considered in finalizing this report. (See apps. V and VI.)

Our work, done from January through August 1987, was in accordance with generally accepted government auditing standards.

Employer Verification of Employment Eligibility Impractical

The nation's estimated 7 million employers are required to review thousands of different documents allowed as evidence of employment eligibility under IRCA, but employers generally are not in a position to make sound judgments on the genuineness of these documents. Employers have been given little guidance and education on the characteristics of fraudulent and genuine documents. Moreover, even SSA employees, who are trained in document authentication, often have difficulty determining whether documents are authentic and relate to the person presenting them.

To simplify, and make more realistic, employer verification under IRCA, the SSN card could be designated as the only authorized employment eligibility document. Such an option should have minimal adverse impact on the public because the Internal Revenue Service already requires that all employees have an SSN for tax purposes. Whether employment eligibility documents other than the SSN card are needed should be studied.

Currently, the cost of replacement cards generated as a result of IRCA is covered by the Social Security Trust Funds, a practice that may be contrary to congressional intent. Also, requiring SSN cards for employment eligibility could significantly increase the cost to the trust funds by increasing the demand for replacement cards.

Employers Not in a Position to Verify Documents

Successful implementation of IRCA's employment eligibility provisions will be hampered by the multitude of documents employees can present as evidence of eligibility. Employers are responsible for reviewing thousands of possible employment eligibility documents to determine if they "appear genuine" and belong to the presenter. These include INS papers and thousands of different birth certificates which, as discussed in chapter 3, present problems even for SSA employees, who are trained and handle such documents daily.

Why the Congress authorized birth certificates and five other types of employment eligibility documents in addition to the SSN card cannot be determined from the House, Senate, and conference reports on the bills that became IRCA. Such authorization does, however, give employees flexibility in proving they are eligible to work. Also, under regulatory authority, the Attorney General authorized 10 other work eligibility documents in addition to those authorized by the Congress. These additions were made primarily because the documents were being used already as evidence of work authorization when IRCA was enacted. But,

in the future, the number of employment eligibility documents established by regulation will be limited to a few documents with improved security features, an INS official told us in October 1987.

Education of employers on document review and acceptance has been minimal. Although INS provided a handbook to employers in July-August 1987 that explained program requirements and employer responsibilities, it contains little information on the characteristics or security features of acceptable documents. For instance, the handbook provides two examples of birth certificates, although there are several thousand variations of possible birth certificates that could be presented to employers. In addition, although there are 16 valid SSN cards, the handbook provides a picture of only the latest.

We do not believe it is feasible to educate employers on the thousands of acceptable documents. At the same time, unless employers are given guidance, the employment certification process under IRCA is vulnerable to fraud. Further, additional controls provided by replacing the SSN card with a more secure version would be limited unless employers are advised what to look for.

IRCA requires the President to assess the adequacy of the employment verification system. According to an INS official, the study will probably be carried out by an interagency work group composed of representatives from the Departments of HHS, Labor, and Justice.

Making SSN Card Sole Evidence of Employability

One way to resolve verification difficulties is to designate the SSN card as the only document that can be used as evidence of employment eligibility under IRCA. We believe the SSN card would meet the needs of both employers and employees and offer advantages over the present system.

With such a change, employers would have only the SSN card with which to become familiar, rather than the thousands of different birth certificates and other documents that now can be provided as evidence of employment eligibility. Also, educating employers in detecting fraudulent cards would be more feasible than trying to educate them on the many types of documents now authorized.

Virtually no new requirements would be imposed on employment seekers. For tax purposes, the Internal Revenue Service requires everyone in this country who has an employer to have an SSN. However, persons

who no longer have or cannot locate their SSN card would have to apply for a replacement when they seek employment.

A potential drawback of such a proposal is that it could be viewed as a step in the direction of a national identity card. On the other hand, arguably the SSN card in the context of IRCA is an employment eligibility document, not an identity document. This proposal does not address the multitude of identity documents that are authorized under IRCA, nor would it solve the problem of individuals who assume a false identity and use an SSN card not their own.

Cost of Replacement Cards

Another possible adverse effect of this option is that it would likely increase requests for replacement SSN cards. Presently under IRCA, if a prospective employee did not have an SSN card, a birth certificate could be used instead. With this proposal, individuals would have to request replacement cards if they had lost or misplaced their SSN card. Over time, however, requests for replacement cards could diminish because of the increased value of the SSN card under this proposal.

The cost of issuing replacement cards for purposes of IRCA could be significant. In fiscal year 1987, for example, SSA issued 7.9 million replacement cards. This is 1.6 million (or 25 percent) higher than the number of replacement cards issued in fiscal year 1986. According to an SSA official, the significant increase in 1987 requests probably is due to IRCA. Using SSA's average cost of $7.25 to process an application as the cost to issue a replacement card, the cost to process the additional 1.6 million replacement card requests in fiscal year 1987 was about $11.6 million. Using the SSN card as the sole employment eligibility document would likely increase this cost to some extent; by how much is not known.

IRCA provided that changes to the SSN card are to be paid out of appropriated funds. The act, however, does not specifically address the financing of SSN card replacements issued as a result of IRCA.

An option for financing the cost of replacement cards under IRCA would be to charge a fee for all or certain replacements. Such a proposal was made earlier in an HHS OIG report. In its response dated June 15, 1984, SSA said it opposed charging a fee for SSN card replacements for a number of reasons, including that issuing replacements served SSA program purposes. With a card in hand, individuals do not have to rely on their memories; an accurate SSN in turn will result in accurate posting of earnings.

Private Sector Opinions Sought

We discussed the option to have the SSN card as the only employment eligibility document under IRCA with representatives of the following organizations:

- Federation for American Immigration Reform (a nonprofit organization whose goals are to end illegal immigration and to "set legal immigration at levels consistent with the . . . realities of the 1980s").
- National Association of Manufacturers.
- American Federation of Labor/Congress of Industrial Organizations (AFL/CIO).
- U.S. Chamber of Commerce.
- Mexican American Legal Defense and Educational Fund (a nonprofit organization created in 1968 to protect the civil rights of Mexican Americans and other Hispanics).

The Federation for American Immigration Reform supported the proposal, saying that it, coupled with a telephone verification system for the SSN card, would represent an improvement for IRCA. The National Association of Manufacturers stated that the proposal should have negligible impact on the ability of manufacturers to hire employees and had no problem with it, provided that the SSN card is made counterfeit resistant. According to the AFL/CIO, the proposal was reasonable provided that the SSN card is made counterfeit resistant and advance notice of the change is provided.

The Chamber of Commerce and the Mexican-American Legal Defense and Educational Fund opposed the proposal because they said it would reduce the flexibility under IRCA and preclude employers from offering employment and employees from accepting employment on a timely basis.

We believe there should be little adverse impact on employees or employers under this option. INS regulations provide that employees have 3 days to produce the required identity and employment eligibility documents. If, however, the documents, including the SSN card, cannot be produced in 3 days, the employee has the option of producing a receipt showing that he or she has applied for the document and must then produce the document itself within 21 days of hire.

SSA now takes on average 11 days to issue an SSN card. In the vast majority of cases, SSA card issuance time should be sufficient to comply with the 21-day requirement, but a regulation change could extend the 21-

day limit under certain extenuating circumstances. Furthermore, appropriate advance notice of the proposed change would permit sufficient time to obtain an SSN card.

Concerning the desire to make the SSN card counterfeit resistant, the current version of the card does have counterfeit-resistant features, but the other versions generally do not. Actions that can be taken to make SSN cards counterfeit resistant are discussed in chapter 5.

Conclusions

Under IRCA, there are too many documents that can be used for employment eligibility purposes to realistically expect employers to control unauthorized employment. Employers are expected to review the genuineness of thousands of possible documents, including birth certificates, which present problems even to trained, experienced SSA employees. With so many allowable documents, the employer verification system under IRCA is very vulnerable to fraud.

INS's plans to reduce employment eligibility documents established by regulation are a step in the right direction. Beyond this, however, the Attorney General should also study whether other employment eligibility documents specifically authorized under current law are still needed. For documents not needed, a legislative remedy should be pursued, and in this respect, we believe the required presidential report on the adequacy of the employer verification system would be an appropriate vehicle to convey any legislative recommendations to the Congress.

The Attorney General should also study the possibility of making the SSN card the only employment eligibility document. We believe this would (1) simplify, and make more realistic, employer verification and (2) impose no new requirements on the public. Because reducing the number of employment eligibility documents could significantly increase requests for replacement SSN cards, this potential additional cost should be determined.

IRCA did not specify who should absorb the additional costs of issuing replacement SSN cards to persons seeking employment who no longer have cards. Although the Social Security Trust Funds are incurring costs relating to such requests, IRCA specified that the costs of any changes to the SSN card not be borne by the trust funds. If the Congress's intent is to eliminate or minimize the additional costs incurred by the trust funds as a result of IRCA, it may be appropriate to finance the cost of replacement

cards by other means, such as appropriated funds or fees charged to requesters of replacement cards.

Recommendations

GAO recommends that the Attorney General consider reducing the number of employment eligibility documents and specifically consider making the SSN card the only authorized employment eligibility document. If the Attorney General concludes that the number of employment eligibility documents under IRCA should be reduced, GAO also recommends the Attorney General and the Secretary of HHS study the potential impact of such a change on requests for replacement SSN cards.

Matter for Consideration by the Congress

The Congress may wish to consider whether the cost of replacing SSN cards as a result of IRCA should be paid for from either appropriated funds or fees charged to those requesting the cards, rather than from the Social Security Trust Funds.

Agency Comments

The Department of Justice said it was already studying ways of reducing the number of employment authorization documents and would have no objection to studying the option of making the SSN card the only employment eligibility document. Justice expressed concern, however, about the ease with which SSN cards can be counterfeited. As previously stated, we recognize that SSN cards can be counterfeited, and later in this report, we discuss actions that can be taken to make the cards more counterfeit resistant. Because the SSN card is already authorized for evidence of employment eligibility, making it the only authorized document would not make the verification system more vulnerable. It would eliminate thousands of different types of documents with which employers may have no familiarity.

HHS said it did not oppose a study of the option of making the SSN card the only employment eligibility document under IRCA. HHS said, however, that such an option would place additional "pressure" on the card (for example, requests for replacements). HHS also expressed SSA's concern that the card not become a national identifier.

In our draft report, we recommended that the Attorney General study the potential impact of a reduction in the number of employment eligibility documents on requests for replacement SSN cards. Because of the potential impact on SSA operations, HHS said that it believed that SSA

should participate in this study. We agreed and have modified our recommendation accordingly.

SSN Application Process Vulnerable to Fraud

SSA has encountered problems in validating the documents submitted in support of applications for an SSN card, especially birth certificates and INS documents. Among the problems with birth certificates are the following:

- Thousands of different forms and versions of birth certificates exist, making it difficult for SSA employees who review SSN applications to be familiar with all of them.
- Birth certificates are relatively easy to alter or counterfeit.
- There is no practical way to determine that the birth certificate belongs to the applicant.

SSA has taken or has underway various initiatives to address these problems. Also, SSA is exploring on a pilot basis the advantages of enumeration (issuance of an SSN) at birth, if desired by the child's parents. Beyond what has been done, however, we believe SSA should take additional action to provide better assurance that birth certificates furnished in support of SSN applications are authentic.

INS documents also often pose problems of authenticity for SSA employees. When individuals provide INS documents in support of an application for an SSN card, we believe that INS, not SSA, should decide if they are valid before a card is issued, because INS is in a better position to determine the alien's status.

Accuracy of SSA's Review of Support Documents

The issuance of valid SSN cards relies heavily on the interviewer's review of the support documents provided by the applicant. According to SSA, SSNs were properly issued in about 99 percent of cases it reviewed. The validity of the documents presented, however, and the adequacy of the field office reviews still cause SSA some concern.

In February 1986, SSA's Office of Assessment reported on a study of the adequacy of evidence accepted in support of SSN card applications. In the study—which involved a sample of about 2,000 cases—personal contact with the applicant was attempted, the evidence presented reviewed, and the evidence verified with the originating organization. The evidence was legitimate in about 99 percent of the cases, the reviewers found, concluding that generally current SSA procedures were adequate. However, the study also concluded:

"It should be emphasized that, despite the redevelopment and extra effort called for in the study, we cannot report with absolute certainty that the age, citizenship and

identity had been established in the 1,966 cases that did not appear to involve fraud. Barring the use of a unique identifier, such as fingerprinting, there is no foolproof way to keep people from using false information to secure an SSN. Unfortunately, the kinds of documents that are acceptable in applying for an SSN include several that are easily forged or obtained under false pretenses . . ."

Also, SSA's high validity rates may be due to the fact that, until IRCA, an employer needed an SSN number for tax purposes, but the individual did not have to present the card. With the enactment of IRCA and the option of using the card to prove employability, we believe the incentives are greater for illegal aliens to obtain a valid SSN card with fraudulent documentation. If use of the SSN card were mandatory, the incentives would be even greater.

Our discussions with SSA field office personnel corroborate the concern expressed by the study that SSN fraud may be more prevalent than the study findings suggest. SSA employees are responsible for reviewing millions of SSN applications per year. Their review includes determining that the documents relate to the individual and are genuine. While 67 percent of SSA employees (59 of 88) we interviewed believed the training they received in the area of fraudulent document detection was adequate, half (44) also believed that fraudulent documents were getting through the process.

When an SSA employee suspects a document is fraudulent, altered, or does not belong to the individual presenting it, he or she is required to verify the document with the issuer. For birth certificates, verification involves contacting the issuing authority, for example, a county or state government. To accomplish this, each SSA field office is given the name and address of issuing authorities and a local SSA field office that can assist with the verification.

Employees we interviewed indicated that they verify on average less than 1 percent of the documents presented. Nearly half of the employees believed that more document verification would identify more fraud. Reasons most frequently cited for not performing more verification included lack of time and workload pressures.

To help its field offices identify fraud, SSA gives them information on known stolen or fraudulent birth certificates. The May 1987 OIG report on SSA's application process found, however, that 55 percent of employees interviewed stated they probably would not recognize a document as

one of those listed in the operations manual, which describes stolen and fraudulent birth certificates.

Commonly Identified Problems With Birth Certificates

The fraudulent use of birth certificates to obtain other documents and identification has been a nationwide problem for years. Also, such misuse can be expected to increase with the implementation of IRCA. Studies of the issues and possible solutions have been done by government and private groups, but limited improvements have been made.

In 1976, the Federal Advisory Committee on False Identification identified the birth certificate as the prime source from which to establish a false identity and secure additional false documentation. Its report recommended standardizing birth records, matching birth and death records, and limiting access to birth certificates.

A June 1976 study by Mitre Corporation under contract to the Department of Justice further investigated the Advisory Committee's proposals on birth certificate controls. This study developed detailed plans for implementing the recommendations. Fraudulent use of birth certificates, it concluded, could be effectively reduced only by simultaneously addressing the application process, the form itself, and the use of birth certificates as an identification document.

In 1984, the Task Force on Criminal Implications of False Identification[1] recognized the birth certificate as

> ". . . the foundation, or breeder document for almost any kind of identification for citizens . . . Over 7,000 State and local vital records offices issue birth certificates with no uniform standards for issuance processes, controls, or quality of documents. In some jurisdictions, birth certificates are easily counterfeited, obtained through imposture, or created from stolen legitimate blank forms."

Currently, the HHS OIG has underway a study of birth certificates. A draft report, Birth Certificate Fraud, was sent to HHS and others for comment in May 1987; a final report is expected to be issued in early 1988.

Common problems with birth certificates as identified by the 1984 Task Force and the draft 1987 OIG study include the following:

[1]Part of the 5th Conference of the Judiciary sponsored by the organization Laws at Work.

- Inconsistency in birth certificate forms. Birth certificates take various forms. Some states issue short-form certificates containing only name and date of birth, while others use long-form certificates containing all birth data, including parents' names. Some states also allow the issuance of certified photocopies instead of the original. A few states, such as California, Texas, and Virginia, prepare their birth certificates on banknote-type paper with security features. Lastly, while some states provide certificates for use by local governments, the latter are not required to use them. To keep costs low, some local governments use commonly available paper for the certificates.
- Easy access to birth certificates. Individuals can easily obtain the birth certificates of others. Ten states allow public access to vital records. As a result, anyone can review the records and later request a birth certificate for use as a breeder document to establish a false identity. Furthermore, the other states generally have insufficient controls to assure that those requesting birth certificates are entitled to the document. For example, while many states require that the requester be the individual or the parent, guardian, or legal representative of the requesting individual, few require the requester to furnish identification. Further, most requests for birth certificates are made by mail or phone.
- Ease of assuming identity of another person. Individuals can obtain the birth certificate of a dead person, using information from newspaper accounts or death registers. While most states are beginning to match their own birth and death records, possibilities for misuse still exist. For instance, some states do not notify local offices of deaths so that an appropriate notation can be made to local records.
- Theft of legitimate blank birth certificate forms. Due to the variety of forms and the many locations at which they are available, legitimate blank forms are vulnerable to theft. SSA's policy is to alert its staff to the existence of stolen birth certificate forms; however, the agency depends on local offices to notify it of thefts. SSA uses updates to its operations manual to alert field offices of the theft of specific localities' birth certificate forms.

Problems With INS Documents

The use of fraudulent or altered INS documents is a problem facing SSA in its enumeration of aliens. There are 17 different versions of INS's resident alien cards (I-151 and I-551), as well as many other INS forms used by aliens to prove their legal status. IRCA specifically authorizes use of the resident alien cards as evidence of employment eligibility.

INS documents represented the majority of documents questioned and verified by SSA employees in the course of their work, SSA field office

employees we interviewed told us. But they generally conceded that, although they ask for verification of more INS documents than birth certificates, the INS documents they verify still represent a small portion of INS documents they receive and accept. The SSA instructions list 15 different types of acceptable INS documentation, ranging from a stamp in a passport to the I-551 with detectable security features. Counterfeits of most of these documents, however, are readily available, according to INS. INS is developing a new resident alien card (I-551) with enhanced security features.

Aliens entering the United States initially contact INS to obtain a permanent resident card but normally do not receive it for many weeks. Frequently, aliens will next contact SSA. Without a permanent resident card, most aliens present SSA with the INS form I-94 (Arrival-Departure Record) inserted in their passport or a stamped passport as proof of legal status and right to work. Both a stamped passport and a passport with an I-94 are specifically authorized as evidence of employment eligibility under IRCA.

According to INS officials, the I-94 form, which is on card or paper stock, has no security features. The form contains an INS stamp, expiration date, and work authorization, but is not standardized. For example, the work authorization may be handwritten or stamped. Likewise, stamping may be either in rust or purple ink.

The absence of security features for the I-94 form led one SSA field office to initiate a pilot project to validate all I-94's presented as evidence of alien status. Of the 280 I-94 forms the office submitted to INS for review, 56 (or 20 percent) were found to be fraudulent.

There are also problems with the authenticity of alien cards, both the I-551 and I-151 permanent resident cards for aliens. The variety of alien cards now in use and the lack of quality control in producing and issuing the earlier versions of the cards have contributed to the ease of altering or counterfeiting these documents. Issued since 1941, these cards have been updated over the years to include additional security features. But existing cards were not replaced, and 17 versions are now in use.

One security feature of the INS alien card is that certain portions of the card are to fluoresce when exposed to a black light. SSA field office staff reported, however, that the alien cards do not always fluoresce. As a result, SSA personnel either must verify the document with INS or accept it as valid.

Verification with INS varies from a telephone call to a written request. According to some SSA employees that we talked to (8 of 88), INS responses can take about 30 days, which can significantly delay the issuance of a card. Because timely processing of SSN applications is a merit pay goal, SSA employees told us the time required to verify INS alien cards is viewed as excessive.

INS Should Certify Aliens' Work Status to SSA

A number of options exist for improving the integrity of the alien enumeration process. These include (1) stationing SSA personnel at INS locations to process the applications, (2) verifying all INS documents through an automated system, and (3) requiring INS to enumerate aliens (which we support).

That SSA should examine the feasibility of stationing SSA employees at selected INS locations to process SSN applications for foreign-born noncitizens was a recommendation of the May 1987 OIG report. Both INS and SSA would benefit from the improved controls, the report concluded, because illegal aliens or those lawfully admitted and not entitled to work would be deterred from applying for SSNs. In instances where an SSA office continued to accept SSN applications from aliens, all INS documents presented as evidence would be verified with INS. SSA, responding to the recommendation on September 1, 1987, stated:

"In determining how enumeration workloads emanating from the immigration legislation would be processed, we considered outstationing and decided against it. Instead, the Immigration and Naturalization Service (INS) has agreed to review and certify SS-5s filed by applicants for legalization under the Immigration Reform and Control Act of 1986. This arrangement, however, does not apply to aliens currently entering the country or to aliens whose status is being changed for other reasons. We would like to suggest that OIG study the INS certification of SS-5s to see if a similar process is feasible for other alien enumeration workloads."

Another possibility is use by SSA of the INS computerized system called SAVE (Systematic Alien Verification for Entitlements).[2] SAVE allows access to INS's computerized records of legally admitted aliens for determining their eligibility for various federal entitlement programs (e.g., Aid to Families With Dependent Children, Medicaid, unemployment benefits, and food stamps). An important limitation on SAVE's effectiveness is the time lag in entering the data to the system. Twenty percent of SSA inquiries would require a manual search, an INS supervisor estimated, because

[2]Discussed in our report Immigration Reform: Verifying the Status of Aliens Applying for Federal Benefits (GAO/HRD-88-7, Oct. 1, 1987).

the applicant is newly arrived and not yet on the system. In addition, the current system would need to be modified to include work authorization data SSA would need to determine the type of card to issue.

We believe that the third option, having INS certify SSN applications during its processing of aliens, is the most advantageous. In fact, this procedure is already in place for the amnesty program. Applicants for amnesty may need valid SSNs for many purposes, including employment and reporting taxes. Under the amnesty program, INS is to certify the SSN applications of legalization applicants, and when this is done, an SSA employee picks them up and takes them to SSA for processing and issuance of an SSN card. This option has the following advantages:

- INS would assume responsibility for certifying the eligibility of aliens to work in this country, thus eliminating SSA concerns over the legitimacy of INS documents.
- Aliens would not have to visit SSA for an SSN card.
- No stationing of SSA employees at INS locations, a proposal to which SSA already has objected, would be required.
- Problems with the timeliness of INS or SAVE verifications would be eliminated.

Enumeration at Birth Could Help to Reduce Fraud

SSA's current process of issuing SSNs requires the individual or someone representing the individual to apply for a number, a labor-intensive process. It could be changed to take advantage of available computer technology. One such change would be to enumerate all U.S.-born children at birth using a tape interchange process with the states. SSA could then issue an SSN card for each infant based on the birth certificate information. As far back as 1972, amendments to the Social Security Act authorize SSA to take measures to assure issuance of SSN cards to young children.

SSA is pursuing the issue of voluntary enumeration at birth on a pilot basis with three states—New Mexico, Indiana, and Iowa. Because enumeration is voluntary, parental consent to share hospital birth data maintained by the states is necessary. If the parents approve, the child will be enumerated through a tape interchange between the states and SSA, and a card will be mailed directly to the family. Enumeration at birth offers significant economies for SSA because it eliminates direct handling of the SSN application by SSA staff. To process each SSN application costs about $7.25, SSA estimates, saying that a state-to-SSA tape interchange would result in substantial savings.

Conclusions

Individuals can fraudulently obtain an SSN card with counterfeited or altered support documents. While the integrity of these documents is outside of SSA control, SSA can do more to ensure that only valid documents are accepted in support of SSN applications.

SSA field offices do verify some documents, but many staff we interviewed said that documents are not verified because of workload pressures and lack of time. Also, many employees believe that additional verification would uncover more fraud. While we are not certain what the payoff of additional verification would be, we believe that SSA should at least explore this issue on a pilot basis to determine its benefits.

The enumeration process for aliens should be modified. SSA and INS should develop a plan that provides for INS to certify to SSA the employment eligibility of aliens. Even if the high validity rates in SSA's internal 1986 report were accurate, the situation may have changed since IRCA was passed.

Recommendations

We recommend that the Secretary of HHS direct the Commissioner of Social Security to experiment with increased document verification to determine the extent of fraud and the benefits of additional verification.

We also recommend that the Secretary of HHS and the Attorney General develop a plan for the enumeration of aliens that would provide that INS certify the employment eligibility of aliens applying for an SSN card or establish an alternative method of employment eligibility verification that would be as effective.

Agency Comments

HHS said that it was confident that, on the whole, SSA's verification procedures were adequate. HHS acknowledged, however, that there are "pockets of problems" and accordingly would pursue the recommendation to experiment with more verification. HHS noted that it is committed to further study in the document verification area and that SSA plans to expand arrangements for voluntary enumeration at birth, which HHS currently views as the best solution to the problems associated with evidence and document verification.

In our draft report, we proposed that the Secretary of HHS and the Attorney General develop a plan for the enumeration of aliens under which INS would certify aliens' eligibility. The Department of Justice said that

it was willing to study the proposed recommendation but that it also wanted to study other, less costly alternatives to having INS certify aliens' eligibility, such as the enhanced use of SAVE. We have revised our recommendation to reflect that another, equally effective method, if developed, could be used.

HHS said that it was in general agreement with the recommendation and pointed out a number of potential problems that may have to be addressed as part of examining the alien enumeration process.

SSN Cards Vulnerable to Fraudulent Use

SSA's current process for issuing social security cards allows certain aliens to receive cards that do not adequately reflect their limited work authorization. Many aliens receive an SSN card that looks no different than any other, even though they are allowed to work only for a certain period of time.

An option being explored by SSA to prevent SSN card misuse is a telephone verification system for employers. Another alternative is to place on the SSN card additional identifying data that will link the card to its owner. This latter option, however, may run counter to IRCA's intent not to establish a national identity card.

Need to Annotate SSN Cards for Certain Aliens

Most aliens are admitted to the United States under temporary status, not as resident aliens. These temporary aliens are permitted to stay in the country for specific time periods and may be given authorization to work for all or part of their stay.

Furthermore, the status of temporary aliens can change during their stay. For example, some temporary aliens may be granted an extension of their stay and work authorization. Others may be granted extensions but without work authorization. In other cases, neither their stay nor their work authorization may be extended, but they possess a valid SSN card with no time limitation. SSA records do not contain the time limit for work authorization, there is no requirement to update SSA's records to show the alien's current status, and cards with an unlimited life are issued to aliens who are only authorized to work in the United States for a limited time.

Thus, employers reviewing the SSN cards of such individuals would not discern their restricted work status. Like all other cards, those issued to aliens contain only a name and an SSN. One way to address this problem is to put an expiration date on the card. Another way is to place a legend on the card stating in effect that it is valid for employment purposes only if accompanied by an INS document that specifically authorizes employment. The latter has the advantage of eliminating the need for SSA to issue a new card whenever the temporary status of aliens changes. At the same time, however, it increases the potential for fraud in situations where an accompanying INS document can be altered or counterfeited.

Options to Reduce Fraudulent Use of SSN Cards

One option under consideration by SSA to reduce the fraudulent use of SSN cards is to institute a telephone verification system for employers that would validate the legitimacy of the SSN. Another option would place on the SSN cards additional identifying data, such as a picture or physical description that more directly links the card to its authorized owner.

SSA's Telephone Verification Project

Currently, SSA is conducting a pilot project to determine the feasibility of a telephone verification system for the use of employers. The project's goals are to (1) evaluate ways to more effectively control the issuance of SSNs and their use in the workplace and (2) reduce the incidence of earnings reported by employers for their employees under incorrect SSNs. Also, the study will help SSA prepare for the SSN validation study required under IRCA to determine the feasibility and cost of an SSN validation system for employers.

Participation in the project, begun January 20, 1987, is voluntary and available to about 70,000 employers in the Dallas, El Paso, and Corpus Christi areas. The verification unit, housed in an SSA Dallas district office, responds to inquiries of employers who provide the employee's name, SSN, and date of birth. An SSA employee checks the database to verify that SSA records show that the number was issued to the person named and with that date of birth. If the information provided does not agree with SSA's record, the employer is advised to tell the prospective employee to contact an SSA office for resolution.

Through December 15, 1987, employers had made about 13,500 calls to verify 23,158 SSNs of prospective employees. SSA was able to verify 81 percent of the SSNs provided for verification. A name mismatch was the primary reason the unit could not verify the SSNs. Other reasons included the date of birth differed, the number provided was invalid, or the individual was not authorized to work. Table 4.1 summarizes the results of the project.

Table 4.1: SSN Telephone Verifications
(Jan. 20-Dec. 15, 1987)

	Number	Percent
Positive verification	18,761	81.0
Incomplete verification	392	1.7
Negative verification	4,005	17.3
Name	2,517	10.9
Date of birth	822	3.6
Invalid SSN	486	2.1
Nonwork SSN	162	0.7
Other	18	•
Total attempted verifications	**23,158**	**100.0**

Employers in high-turnover industries—including construction companies, building trades, temporary employment agencies, and food service companies—were the most likely to contact SSA to verify employee SSNs.

The project provides some assurance to employers that the SSN card presented by prospective employees is valid and the individual presenting it is the owner. This verification could reduce the number of individuals using

- fraudulent cards with invalid numbers,
- nonwork or restricted SSN cards, and
- cards belonging to children or other persons where the age entered differs significantly from that of the bearer of the card.

This system would not, however, prevent individuals from sharing SSN cards or from fraudulently obtaining valid cards.

Nor can SSA's pilot be used to project the results of a national verification project, for a number of reasons. This pilot is voluntary, and less than 2 percent of the employers in the area have used it. In addition, the three cities selected are in an area with a large illegal population, which could skew the results of verifications attempted. Lastly, the pilot was a manual process in that SSA employees handled the calls manually. A national verification system, if one were to be established, would likely use an automated system as much as possible.

While initially intended to be a 6-month pilot, the pilot was still operating as of January 7, 1988. No decision had been made on the project's future.

Personal Identifying Data on the SSN Card

Another option for reducing fraudulent use of the SSN card involves placing personal identifying data on it to allow it to be linked to the bearer. Personal identifying data can include height, weight, eye color, a photograph a fingerprint, or some other information that can be used to verify the bearer's identity. However, including such data could be construed as a step toward using the card as an identity document, which may be in conflict with IRCA.

Although the card's integrity could be enhanced by adding a photograph, doing so would require periodic reissuance to account for changes in appearance over time. Identifying data, such as height, weight, and eye color, as is shown on most driver's licenses could also be added. Again, periodic reissuance would be required to keep the information current and usable.

More reliable identifiers, such as fingerprints and the unique characteristics of the retina and voice, are available but involve the use of specialized equipment or technical skills. These identifiers would result in a system that is costly and impractical for general use, because of the need for computer capability to verify the data or, if done manually, review by technical specialists. For example, a computerized system using fingerprints would cost an estimated $30,000 for a terminal that reads and verifies the fingerprints on the card. In addition, these identifiers, especially fingerprints, have a criminal-like connotation, which could cause a negative public reaction.

One identifier that could be placed on the card is the date of birth. Including a date of birth could reduce some of the present misuses of the card and would give employers some assurance that the user is the bearer. For example, including a date of birth would eliminate some of the sharing of SSNs that currently occurs. Most notably, alien parents would no longer be able to use the card of a U.S.-born child as their own. However, including any additional data would increase the use of the card as an identity document.

Conclusions

At present, an alien with a temporary work authorization can obtain an SSN card that looks no different from any other card. SSA's issuance procedures need to be modified to annotate such cards to indicate an alien's temporary authorization.

Recommendation

We recommend that the Secretary of HHS and the Attorney General develop a plan for annotating SSN cards for aliens who are authorized to work in this country on a temporary basis.

Agency Comments

Justice said that INS staff are involved in discussions on this and other related issues with SSA, and INS had no objection to intensifying these discussions in accordance with our recommendation.

HHS said that it supported developing a plan for annotating cards for aliens authorized to work on a temporary basis. HHS also said it did not favor putting an expiration date on the SSN card because of the frequent requests for replacement that such an approach could generate. HHS also pointed out that annotating the SSN card could constitute a "major change" under IRCA and therefore would have to be preceded by advance notice to the Congress.

Options for Making the SSN Card More Counterfeit Resistant

Many technologies exist to increase the security of the SSN card, especially its resistance to counterfeiting.[1] These range from making minor changes to the existing card to undertaking a major redesign, such as creating a card with an integrated circuit that would be tied into a national database and could be read by any employer. The costs associated with these alternatives range from a fraction of a penny to about $5 per card, exclusive of the cost for card-reading equipment.

Copying machines that can copy colors pose a significant counterfeiting threat to the SSN card. Making the card copy-proof to this technology would be relatively inexpensive. We recommend that steps be taken to counter the threat of color copiers, but do not believe additional technological changes are justified for a number of reasons, including (1) the relatively high cost, (2) the uncertain benefits, and (3) many major problems that would be left unresolved, for example, the inherent problem with birth certificates.

Security Features of SSN Cards

Beginning on October 31, 1983, SSA issued a revised SSN card (version no. 16) with built-in security features that made the card more counterfeit resistant. Since then, the revised SSN card has been issued to about 40 million individuals applying for original and replacement cards. About 267 million SSN cards that were issued under the 15 earlier versions of the card remain valid and have little resistance to counterfeiting.

The current card was designed in consultation with the Department of the Treasury's Bureau of Engraving and Printing, the Secret Service, and the Government Printing Office. Its security features combine the uniqueness of the paper, printing, and the inks used. A copy of the card is shown in figure 5.1.

The major security features of the current SSN card, their purpose, and the method of checking them are summarized in table 5.1.

[1]Includes resistance to tampering and altering the information on the card.

Figure 5.1: Copy of Current SSN Card

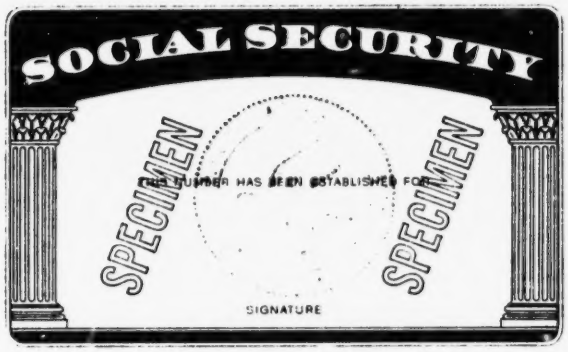

Table 5.1: Security Features of the Current SSN Card

Security feature	Requires	Advantage
Marbleized blue background tint in a random pattern that is erasable	No sensory aid	Allows easy detection of alterations
Yellow, pink, and blue planchettes (discs) implanted in a random pattern on front and back of the card	No sensory aid	Very time-consuming for a counterfeiter to reproduce
Intaglio printing providing a raised effect and abrasiveness that can be felt when examined by touch	No sensory aid	This printing technology not widely available and is difficult to replicate
Microline printing on signature line which appears and photocopies as a solid line, but the words "Social Security Administration" are visible with a magnifying glass	Sensory aid	Offset, the method of printing most commonly available and used by counterfeiters, cannot replicate this effect
HHS seal, blue planchettes, and the words "Social Security Administration" fluoresce under ultraviolet light	Sensory aid	Fluorescent inks not generally used by counterfeiters because they are not needed to produce a passable document
Paper used for the card has special reactions to chemicals commonly used for alterations or erasures	Technical expertise	This paper not commonly available and is expensive Counterfeiters generally use readily available, low-cost paper

Most features are easily discernible without technical expertise, as the table shows. These features were selected, according to SSA officials, because of the wide use of the SSN card and the limited technical skills of the reviewing individuals.

Color Copiers—A Major Counterfeiting Threat

Over time, new technologies emerge that allow individuals to tamper with or duplicate the currently counterfeit-resistant documents. Government and industry officials are concerned about the new generation of color copiers that are expected to be introduced on a wide-scale basis. These copiers pose an immediate threat to documents such as the SSN card that rely heavily on color as a security feature. With these copiers, even the most casual counterfeiter can easily produce a card that likely would be acceptable to reviewers.

The Treasury Department also has expressed concern over color copiers and is adding a security feature to U.S. currency that will make photocopying impossible. This security feature is a clear polyester thread, imbedded in the paper, that will not copy. Other options available to prevent copying of documents include a void feature (which is not visible on the original document but becomes visible when copied), a watermark in the paper, or a latent image in the design that will also not copy.

Available Counterfeit-Resistant Technologies

Technologies exist to provide security features that discourage individuals from producing counterfeit cards. If the incentives are great enough, however, persons will attempt to counterfeit even the most secure documents. Further, counterfeiters do not strive for a perfect replica of a document, but one that will be widely accepted as authentic in the context of its intended use.

Security features that can be applied to cards depend largely on the choice of card medium—paper, plastic, or polyester. Hence, for discussion purposes, we group the technologies in these categories.

Paper Cards

Paper cards, which typically cost a few pennies to produce, generally offer the most flexibility because security features added to a paper medium can include a combination of the card design, paper stock, printing style, and inks.

A paper card can be designed so that it can be authenticated by visual as well as technical inspection. Card design can include security features such as optical variable devices—hidden or visible images that appear or change appearance when viewed at different angles. For example, holograms are laser-produced optical variable designs that are difficult to reproduce.

The paper stock can have features that are difficult to reproduce in any manufacturing plant other than the original. Such features include watermarks, colored or metallic threads, and certain chemical reactivity incorporated into the stock.

Printing techniques can make it difficult to reproduce the card without expensive equipment that is not widely available. For example, intaglio printing can print intricate designs in three dimensions. This printing process can foil the efforts of most counterfeiters, whose equipment is less sophisticated.

Paper cards can also absorb a variety of inks, some having security features such as sensitivities to chemicals, heat, or light. For example, various inks are available that inhibit the duplication of exact colors, have special reactive features, and do not photograph or photocopy well.

Information on the various human-readable security features that could be applied to the present SSN card appears in table 5.2. The cost of individual features generally would represent a one-time design cost that would add a fraction of a penny to the cost of individual cards.

Table 5.2: Human-Readable Security Features That Could Be Added to the Current SSN Card

Category	Security feature	Description	Counterfeit deterrence/comment
Design	Latent image	Document observed from an oblique angle reveals an otherwise hidden image	Image cannot be reproduced by camera or copier
	Holoprint	Color shifts are observed upon angle changes	Color shifts cannot be reproduced by photocopying Can be affixed to all card mediums
	Holograms	Optical diffracting structures produced using laser interference methods Costs 5 to 7 cents per card	Established process for which nonsecurity applications, such as advertising and product promotions, are increasing Not practical for paper applications—increases thickness
	Fine line vignettes	Engraved tiny lines and dots of lifelike scenes or objects	Engraved lines will appear broken if photographic duplication is attempted
	Void feature	Uses hidden images that are not visible on the original document	When photocopied, the background washes out and the word "void" appears on the copy
Paper	Watermark	Obvious or less obvious design incorporated into paper during the manufacturing process that becomes visible when held up to the light	Used in European currencies Cannot be photographed or photocopied Can be used only with paper
	Colored security fibers	Colored fibers are imbedded in the paper and can be seen under close inspection (unaided) and removed with tweezers	Used in U.S. currency Counterfeiters will often place replicas of the fibers on the paper and, because they are not fibers, they cannot be removed
	Security threads	A clear polyester metal thread is incorporated in the paper	Thread is detectable only with transmitted light—not reflected light that is used by copiers Under development for use in U.S. currency
Ink	Metamo heat	Heat-sensitive ink changes colors in reaction to temperature changes	Requires no hardware—color changes can be affected by touch Photocopies will not produce the same effect
	Metameric ink pairs	Two colors that appear the same to the naked eye but under spectral analysis are different	Photcopies as two colors
Printing	Lathe work	Abstract and geometric patterns that can be applied to paper	Cannot be accurately reproduced without knowing the precise lathe settings Generally will not photocopy well
	Split fountain inking	Multiple colors are used to produce the background of a document	Copies cannot accurately reproduce the blending of colors Used on new U.S. Treasury checks

Additional security features that can be added to the current paper SSN card include ones that are not human readable. These include the magnetic stripe, which is not generally used on paper documents. Magnetic stripes are discussed in detail in the following section.

Another technology that can be applied to paper to insure the legitimacy of the card involves the use of a light beam to scan the paper document and read the random natural fiber patterns. This pattern is then digitized for inclusion directly on the card or on a magnetic stripe. The authenticity of the card then can be checked by scanning the card with a light beam and comparing this with the digitized pattern encoded on the card. Present uses of this technology include stock certificates and certain retail items to prevent the acceptance of fraudulent certificates or counterfeit goods. The costs associated with this technology include 2 to 20 cents per card and $75 to $200 for off-line readers.

Plastic or Polyester Cards

Plastic cards are very common (most notably in credit cards) and cost 10 to 15 cents each. Polyester cards are much less common and have the advantage of being very flexible, unlike plastic cards, which can break, crack, or bend out of shape over time. The cost of a polyester card ranges from 35 to 50 cents.

The major advantage that plastic and polyester cards offer over paper cards is that they can use data storage mechanisms that are not generally compatible with paper cards. The mechanisms, including magnetic stripes,[2] integrated circuits, and lasers, provide increased security over the card data.

These technologies however, are more costly, requiring the use of electronic equipment, ranging from off-line readers that merely validate the card and the data encoded on the card to on-line systems that are linked to a central database and provide further verification of the card's validity and data. In addition, the integrated circuit and laser cards and related equipment are not now standardized to ensure an interchange between systems made by different manufacturers. The following sections describe these storage mechanisms in greater detail.

Magnetic Stripe

The magnetic stripe is the most widely used and accepted machine-readable data storage method in the United States. The credit card and

[2]Magnetic stripes can be used with paper cards but generally are not because plastic is more durable.

banking industries have used magnetic stripes for years to encode data. The stripe can store 200 characters of data and requires a reader to interpret the data and validate the card's authenticity.

The commercial availability of readers and coding/decoding equipment diminishes the magnetic stripe's protection against counterfeiting. As a result, the magnetic stripe is not nearly as secure and counterfeit resistant as it once was.

To overcome the security concerns with the current magnetic stripe, a new technology has developed. This is a special tape process that permanently codes a number on the magnetic tape during manufacturing. The number is encoded on a portion of the magnetic tape, which makes the data on the tape secure, anticounterfeit, and unalterable. Any attempts at alteration or counterfeiting are prevented since the encoded portion of the tape will no longer be valid. Existing readers for magnetic stripe cards, which cost $100 to $150 each, can be modified for $50 to accommodate the use of this type of magnetic stripe. A new reader is about $195.

Integrated Circuits

Integrated circuit cards, generally called "smart cards," involve the placement of a microchip, microprocessor, and memory in a plastic or PVC (polyvinyl chloride) card. The data stored in the chip can be verified or manipulated for purposes of updating.

In the United States, use of integrated circuits as a technology to store data is generally limited to pilot testing and development. However, integrated circuits are in widespread use in France and Japan—where the technology was developed.

Security of the card is considered high since the issuer is the only person able to change data encoded on the card. Access to and alteration of card data by others require technical expertise and sophisticated equipment. Unauthorized attempts to alter card data would invalidate the card, and reactivation could be done only by the issuer.

Smart cards require special reading equipment to validate authenticity. In addition, the information embedded in the card can be interfaced with a central database to provide additional verification of the card's validity or update the card data. Off-line card readers that validate the card's authenticity cost $200, while on-line readers that require computerized equipment and telephone lines cost considerably more.

Some major credit card companies are testing smart cards in the United States. Officials of these companies view smart cards as the future technology that will be used for credit cards. They told us that implementation is not expected in the near term because of the lack of industry standards and the public education and acceptance that will be needed.

Governmental agencies, including the Department of Agriculture, the Department of Defense, and INS, also have explored the use of smart cards. After 2 years of pilot testing, USDA is now issuing smart cards to peanut farmers to control the peanut price-support programs. These cards, to be issued to 65,000 farmers, will allow USDA to track the farmer's production, allocated quotas under the price support program, and the price. USDA is now considering a similar pilot test for tobacco farmers.

The Department of Defense and INS have conducted studies of available card-based technologies including smart cards for improvements to their identification card systems. No decisions have been made on the technology to be used, but their studies raised concerns about the durability of the chip and the PVC card and the cost. Current estimated cost for a smart card is $10 to $12, but industry officials state that production of quantities in excess of a million would reduce the cost per card to $3 to $4, excluding the cost of readers.

Laser Data Storage

Laser data storage, also generally limited to pilot testing and development in the United States, offers dramatic improvements over both the magnetic and integrated circuit storage methods. Cards using laser storage have very large storage capacities (up to 800 pages of character data). In addition to character data, lasers can be used to record images, including voice prints, fingerprints, X-rays, and photographs. This capability is a feature that makes laser storage more attractive than magnetic stripes and integrated circuits, which can only encode character data.

Laser data storage has been tested for use in the health care industry. The system under development is designed to provide each subscriber with a card that has laser-encoded insurance, medical, and personal information. Health care providers will have the equipment to read and write information on the card. As a result, the provider will have immediate access to a patient's medical history, which could eliminate unnecessary tests and assist in providing emergency care. In addition, use of this system will automatically generate an insurance claim.

While laser technology offers dramatic improvements in storage capacity, it is still in the early stages of development. The plans to implement a laser card system in the health care industry have been put on hold due to problems with the development of the ancillary equipment and the insurance company's concern that only a sole supplier exists.

The estimated cost for a laser card ranges from $1.50 to $5.00. The readers cost $650, while a reader and writer costs $1,600. Further, while laser data storage is much greater than that available with magnetic stripes or integrated circuits, this storage capacity is more than is needed for most applications.

A summary comparison of the electronic data storage methods, including costs of the card and the related equipment, appears in table 5.3. The cost figures have not been validated and are based on discussions with vendors.

Table 5.3: Data Storage Mechanisms Usable With Plastic or Polyester Cards

Technology (cost)	Hardware (cost)	Remarks
Magnetic stripe ($.05 per card, plastic)	Reader (quantities of 1,000 or more, $100-$150)	Commercially used to verify validity of credit cards and authorize access to automated banking
Magnetic watermark: Magnetic tape is permanently encoded during tape-manufacturing process ($.12-.30/card)	Converting available readers ($50) New reader ($195)	-
Integrated circuit (About $3.50/card)	Card reader ($95 in quantities of 1,000 or more) Card reader without keyboard ($100-$500) Personal computer ($1,500-2,000) Reader with keyboard ($2,000-3,000)	Commercial use in U.S. generally limited to pilots in credit card industry and sales/inventory recording USDA use for peanut farmers
Laser (About $1.50-5.00/card)	Reader/writers ($1,600) Readers ($650)	Pilot testing in health care industry

Should Security of the SSN Card Be Upgraded?

As stated earlier, the SSN card should be upgraded to deal with the threat posed by color copiers. Beyond this, however, we are not recommending additional changes to the card for the following reasons:

- Significant enhancements to the security of the SSN card, such as linking the card to the owner through fingerprints or photographs, may run counter to IRCA's intent not to establish a national identification card.
- Even the most secure card would be vulnerable to the shortcomings of the SSN card application process. That is, birth certificates and other documents are easily counterfeited or altered, and currently there is no effective, practical way of proving that the bearer of the certificate is the owner.
- Under IRCA, numerous documents, including birth certificates, can be used for employment eligibility purposes. As long as these numerous documents are acceptable, securing the SSN card would only result in an increased use of the other documentation.
- The more sophisticated technology is relatively expensive and in some cases is still under development.
- Rapid advancements in technology may make today's technology obsolete relatively soon. Also, for essentially the same reason, what is counterfeit resistant today may not be tomorrow (for example, U.S. currency).

Another significant factor to consider in upgrading the security of the SSN card is the administrative cost of reissuance, which is in addition to the cost of the card itself. SSA estimates its administrative costs for completely reissuing the over 200 million active cards would be about $1.1 billion. (SSA's total annual administrative costs are about $4 billion.)

If required to completely reissue the cards, SSA officials told us SSA would not automatically reissue cards to current card holders. Rather, SSA would require individuals to apply for a replacement card and provide the necessary proofs before a card would be issued. To merely reissue cards to existing cardholders would allow some of the problems in SSA's records to continue because most cards were issued before SSA required applicants to provide proof of citizenship and identity. As a result, requiring applications for a replacement card would help SSA to prevent ineligible individuals currently holding a valid card from obtaining a new one.

An alternative to mass reissuance of SSN cards would be to adopt the technology of choice for only new or replacement cards. This would essentially avoid the $1.1 billion cost of mass reissuance, but would also

reduce the benefits to be realized from the new technology because the old cards would still be valid. This is the approach we believe SSA should take to begin countering the threat of color copiers, and we believe it appropriate for the reasons discussed earlier.

Another problem with proceeding with an expensive upgrade of the security of the SSN card is that the benefits of an upgrade are not well known. Neither SSA nor INS has done studies that would quantify the extent or nature of the misuse of SSN cards.

Annually, INS apprehends about 1 million illegal aliens. Many of these aliens have SSN cards in their possession, and INS in turn forwards the cards to SSA. Sampling and systematically analyzing these cards by INS could answer important questions, such as the following:

- How many of the cards are counterfeit?
- What versions of the cards are being counterfeited?
- How many and what versions have been altered?
- Is the number on the card valid or invalid?
- If valid, does the number and name match SSA's records?
- Does the card name match the name (if known) of the alien who was apprehended?

The answers to these questions would be helpful in developing a strategy to address the misuse of SSN cards.

Conclusions

A significant threat to the integrity of the SSN card is the introduction of the new generation of color copiers, and we believe that SSA should act to safeguard future SSN cards against this threat. To accomplish this, there are a number of relatively inexpensive technological alternatives from which to choose.

Also, we believe that INS and SSA should conduct a study of SSN cards confiscated from illegal aliens. Such a study could yield useful information to both agencies to help combat the misuse of SSN cards.

Recommendations

We recommend that the Secretary of HHS direct the Commissioner of Social Security to secure new and replacement SSN cards against the threat posed by color copiers.

We also recommend that the Attorney General and the Secretary of HHS study the cards confiscated from illegal aliens to identify the extent and methods employed to obtain and use SSN cards.

Agency Comments

HHS said that it has already taken action to address the color copier threat and all new and replacement SSN cards will contain a new security feature.

The Department of Justice said it favors enhanced security features for the SSN card, but believes that the threat posed by color copiers is only a small part of the problem. Both Justice and HHS supported the recommended study, stating it would give a clearer picture of the nature and scope of the problem.

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Employment Eligibility Verification (Form I-9)

EMPLOYMENT ELIGIBILITY VERIFICATION (Form I-9)

1 EMPLOYEE INFORMATION AND VERIFICATION: (To be completed and signed by employee.)

Name (Print or Type) Last	First	Middle	Birth Name
Address Street Name and Number	City	State	ZIP Code
Date of Birth (Month Day Year)		Social Security Number	

I attest, under penalty of perjury, that I am (check a box):

- ☐ 1 A citizen or national of the United States
- ☐ 2 An alien lawfully admitted for permanent residence (Alien Number A _____)
- ☐ 3 An alien authorized by the Immigration and Naturalization Service to work in the United States (Alien Number A _____ or Admission Number _____ expiration of employment authorization, if any _____)

I attest, under penalty of perjury, the document(s) that I have presented as evidence of identity and employment eligibility are genuine and relate to me. I am aware that federal law provides for imprisonment and/or fine for any false statements or use of false documents in connection with this certificate.

Signature	Date (Month Day Year)

PREPARER/TRANSLATOR CERTIFICATION (To be completed if prepared by person other than the employee.) I attest, under penalty of perjury, that the above was prepared by me at the request of the named individual and is based on all information of which I have any knowledge.

Signature	Name (Print or Type)		
Address (Street Name and Number)	City	State	Zip Code

2 EMPLOYER REVIEW AND VERIFICATION: (To be completed and signed by employer.)

Instructions:
Examine one document from List A and check the appropriate box, ***OR*** examine one document from List B ***and*** one from List C and check the appropriate boxes.
Provide the ***Document Identification Number*** and ***Expiration Date*** for the document checked.

List A Documents that Establish Identity and Employment Eligibility		List B Documents that Establish Identity	**and**	List C Documents that Establish Employment Eligibility
☐ 1 United States Passport		☐ 1 A State-issued driver's license or a State-issued I.D. card with a photograph, or information, including name, sex, date of birth, height, weight, and color of eyes (Specify State) _____)		☐ 1 Original Social Security Number Card (other than a card stating it is not valid for employment)
☐ 2 Certificate of United States Citizenship		☐ 2 U.S. Military Card		☐ 2 A birth certificate issued by State, county, or municipal authority bearing a seal or other certification
☐ 3 Certificate of Naturalization		☐ 3 Other (Specify document and issuing authority) _____		☐ 3 Unexpired INS Employment Authorization Specify form # _____
☐ 4 Unexpired foreign passport with attached Employment Authorization				
☐ 5 Alien Registration Card with photograph				
Document Identification # _____		***Document Identification*** # _____		***Document Identification*** # _____
Expiration Date (if any) _____		***Expiration Date (if any)*** _____		***Expiration Date (if any)*** _____

CERTIFICATION: I attest, under penalty of perjury, that I have examined the document(s) presented by the above individual, that they appear to be genuine and to relate to the individual named, and that the individual, to the best of my knowledge, is eligible to work in the United States.

Signature	Name (Print or Type)	Title
Employer Name	Address	Date

Form I-9 (05-07-87)
OMB No. 1115-0136

U.S. Department of Justice
Immigration and Naturalization Service

Employment Eligibility Verification

NOTICE: Authority for collecting the information on this form is in Title 8, United States Code, Section 1324A, which requires employers to verify employment eligibility of individuals on a form approved by the Attorney General. This form will be used to verify the individual's eligibility for employment in the United States. Failure to present this form for inspection to officers of the Immigration and Naturalization Service or Department of Labor within the time period specified by regulation, or improper completion or retention of this form, may be a violation of the above law and may result in a civil money penalty.

Section 1. Instructions to Employee/Preparer for completing this form

Instructions for the employee.

All employees, upon being hired, must complete Section 1 of this form. Any person hired after November 6, 1986 must complete this form. (For the purpose of completion of this form the term "hired" applies to those employed, recruited or referred for a fee.)

All employees must print or type their complete name, address, date of birth, and Social Security Number. The block which correctly indicates the employee's immigration status must be checked. If the second block is checked, the employee's Alien Registration Number must be provided. If the third block is checked, the employee's Alien Registration Number ***or*** Admission Number must be provided, as well as the date of expiration of that status, if it expires.

All employees whose present names differ from birth names, because of marriage or other reasons, must print or type their birth names in the appropriate space of Section 1. Also, employees whose names change after employment verification should report these changes to their employer.

All employees must sign and date the form.

Instructions for the preparer of the form, if not the employee.

If a person assists the employee with completing this form, the preparer must certify the form by signing it and printing or typing his or her complete name and address.

Section 2. Instructions to Employer for completing this form

(For the purpose of completion of this form, the term "employer" applies to employers and those who recruit or refer for a fee.)

Employers must complete this section by examining evidence of identity and employment eligibility, and:

- checking the appropriate box in List A ***or*** boxes in both Lists B and C;
- recording the document identification number and expiration date (if any);
- recording the type of form if not specifically identified in the list;
- signing the certification section.

NOTE: Employers are responsible for reverifying employment eligibility of employees whose employment eligibility documents carry an expiration date.

Copies of documentation presented by an individual for the purpose of establishing identity and employment eligibility may be copied and retained for the purpose of complying with the requirements of this form and no other purpose. Any copies of documentation made for this purpose should be maintained with this form.

Name changes of employees which occur after preparation of this form should be recorded on the form by lining through the old name, printing the new name and the reason (such as marriage), and dating and initialing the changes. Employers should not attempt to delete or erase the old name in any fashion.

RETENTION OF RECORDS.

The completed form must be retained by the employer for:

- three years after the date of hiring, or
- one year after the date the employment is terminated, whichever is later.

Employers may photocopy or reprint this form as necessary.

U.S. Department of Justice
Immigration and Naturalization Service

OMB #1115-0136
Form I-9 (05-07-87)

Excerpts From SSN Application

HOW TO APPLY FOR AN ORIGINAL OR REPLACEMENT SOCIAL SECURITY NUMBER CARD

Before completing this application, read the information below, the completion instructions on page 2 and the Privacy Act information on page 4. The Social Security Administration does not charge a fee for Social Security cards and there is no need to pay anyone for this service.

WHERE TO APPLY

Mail or take your evidence documents and application to the nearest Social Security office. However, you must apply in person at a Social Security office if:

1. You are age 18 or older and have never had a Social Security number card before, or
2. You are an alien whose immigration documents should not be mailed.

EVIDENCE YOU WILL NEED

Social Security law requires that you furnish evidence of your age, identity, and U.S. citizenship or lawful alien status. Find one of the four categories below which applies to you and read the instructions carefully. If you apply for a Social Security number for your child or other individual for whom you are legal guardian or legal custodian, you must also furnish evidence of your identity (see list B Below).

You must submit original or certified documents as evidence — we cannot accept uncertified or notarized photocopies. We will return all documents submitted. NOTE: all documents submitted as evidence may be retained temporarily and verified with the custodian of the original records.

If you have any questions or need help in obtaining your documents, please call or visit your nearest Social Security office.

1. U.S. Citizen — Born in the U.S. — Applying for original Social Security number

Please submit one document from list A. **and** at least one from list B.

List A. Evidence of Age and Citizenship
One of the following records established before your 5th birthday:

- Public birth certificate **(This is the preferred document.** You should submit it if at all possible.)
- Religious record showing age or date of birth (To establish citizenship, it must have been recorded within 3 months of birth.)
- Hospital record of birth

If your birth was never recorded or the public record no longer exists, submit documents from list B for evidence of age and citizenship. At least one document must show your name, age or date of birth, and your place of birth. It should be at least one year old.

List B. Evidence of Identity
A public or hospital birth record is not considered evidence of identity. An identity document should contain enough information to identify you. Some items we look for on the document are name, age, address, signature, physical description and picture. Examples are:

- Identity card
- Driver's license
- Adoption record
- Insurance policy
- Youth organization record
- School record
- Medical record
- Work badge or building pass
- Military record
- Court order for name change
- Marriage or Divorce record
- U.S. Passport
- U.S. Citizen ID card
- Religious record (If not submitted as evidence of age)
- Any other document providing identifying data sufficient to establish proper identity.

2. U.S. Citizen — Born outside the U.S.—Applying for Original Social Security Number

If you were born outside the U.S. but are a U.S. citizen you should submit either:

a. U.S. consular report of birth (FS-240 or FS-545) **and** evidence of your identity (see category 1, list B);
OR
b. Your foreign birth certificate (if not readily available, another document showing age or date of birth) **and** one of the following:

- U.S. citizen ID card
- Citizenship certificate
- U.S. passport
- Certificate of Naturalization

3. Alien — Not a U.S. Citizen Applying for Original Social Security Number

If you are an alien living in or visiting the U.S., you should bring in your foreign birth certificate (if available) or passport **and** one or more of the following:

- Alien Registration Receipt Card I-151 or I-551.
- U.S. Immigration Form I-94 (and I-20ID, if applicable), I-181a, I-185, I-186, I-210, or I-586 (and I-444, if applicable)

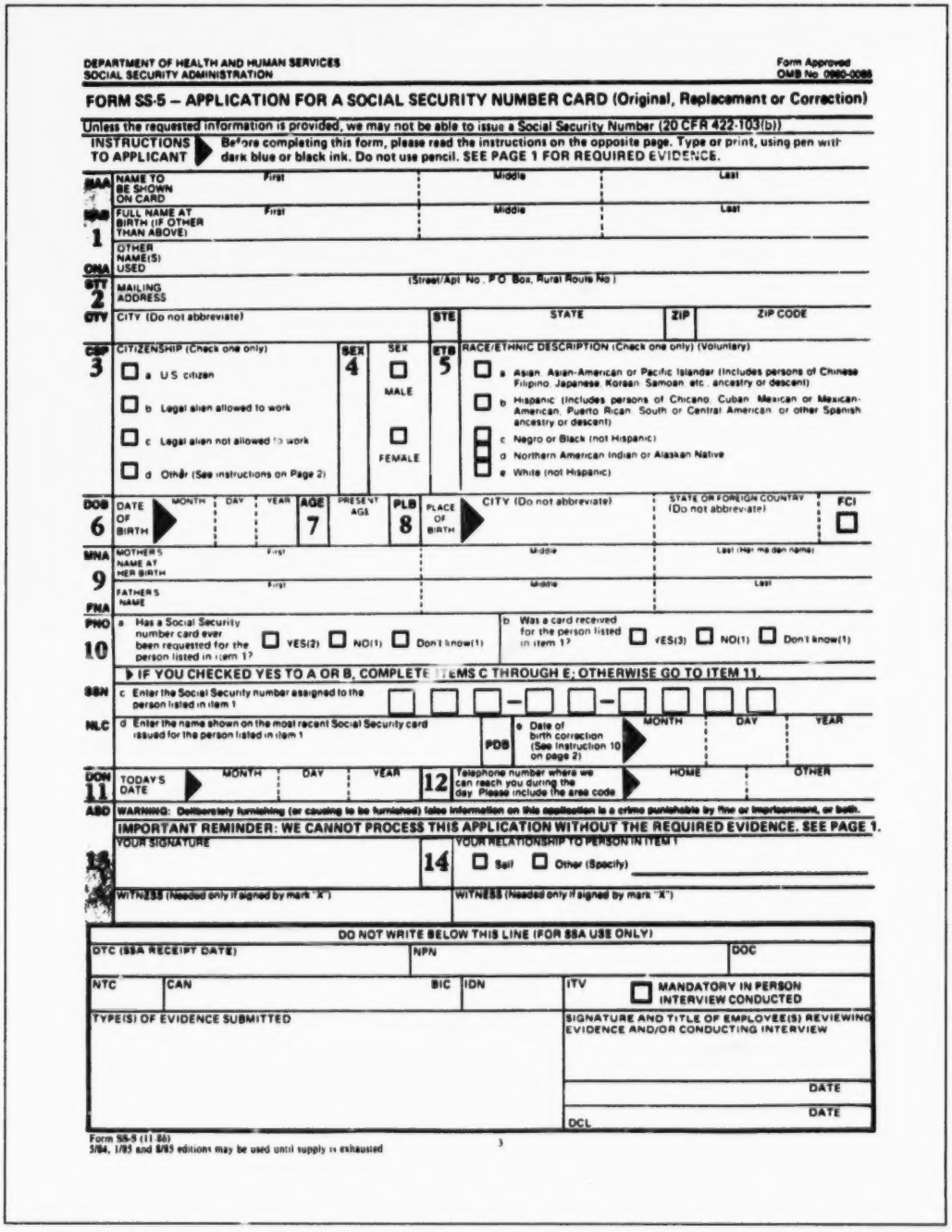
NOTE: If you are a lawfully admitted alien *but not permitted to work* and you have a valid non- work need for a Social Security number, we will issue you a number if you present evidence of such need. However, the card will show that the number is not valid for employment. If you ever use the number in a job, we will notify INS. In addition, any information obtained in connection with this application can be given to INS.

4. Any Applicant Requesting a Replacement Card (Duplicate or Correction)

You must present at least evidence of your identity such as one or more of the documents in categories 1 (List B), 2 or 3. In addition, if you are foreign-born (or U.S.-born but no longer a U.S. citizen), you must submit evidence of your current U.S. citizenship or lawful alien status. After we examine your documents, you may be asked for additional evidence of your age, or U.S. citizenship or lawful alien status.

If you are changing your name, you must provide evidence identifying you under both your **old** and **new** names. We will accept one document if it shows both the old and new names or multiple documents if each shows only one name. If the name change is due to marriage or divorce, your marriage certificate or divorce decree is usually sufficient if it shows both your previous and new names.

Form SS-5 (11-86)
5/84, 1/85 and 8/85 editions may be used until supply is exhausted



DEPARTMENT OF HEALTH AND HUMAN SERVICES
SOCIAL SECURITY ADMINISTRATION

Form Approved
OMB No. 0960-0066

FORM SS-5 – APPLICATION FOR A SOCIAL SECURITY NUMBER CARD (Original, Replacement or Correction)

Unless the requested information is provided, we may not be able to issue a Social Security Number (20 CFR 422.103(b))

INSTRUCTIONS TO APPLICANT ▶ Before completing this form, please read the instructions on the opposite page. Type or print, using pen with dark blue or black ink. Do not use pencil. SEE PAGE 1 FOR REQUIRED EVIDENCE.

FAA 1 NAME TO BE SHOWN ON CARD — First | Middle | Last

SAB FULL NAME AT BIRTH (IF OTHER THAN ABOVE) — First | Middle | Last

ONA OTHER NAME(S) USED

STT 2 MAILING ADDRESS (Street/Apt. No., P.O. Box, Rural Route No.)

CTY CITY (Do not abbreviate) | STE STATE | ZIP ZIP CODE

CSP 3 CITIZENSHIP (Check one only)
- ☐ a U.S. citizen
- ☐ b Legal alien allowed to work
- ☐ c Legal alien not allowed to work
- ☐ d Other (See instructions on Page 2)

SEX 4 SEX
- ☐ MALE
- ☐ FEMALE

ETB 5 RACE/ETHNIC DESCRIPTION (Check one only) (Voluntary)
- ☐ a Asian, Asian-American or Pacific Islander (Includes persons of Chinese, Filipino, Japanese, Korean, Samoan, etc. ancestry or descent)
- ☐ b Hispanic (Includes persons of Chicano, Cuban, Mexican or Mexican-American, Puerto Rican, South or Central American, or other Spanish ancestry or descent)
- ☐ c Negro or Black (not Hispanic)
- ☐ d Northern American Indian or Alaskan Native
- ☐ e White (not Hispanic)

DOB 6 DATE OF BIRTH ▶ MONTH | DAY | YEAR — AGE 7 — PRESENT AGE — PLB 8 PLACE OF BIRTH ▶ CITY (Do not abbreviate) | STATE OR FOREIGN COUNTRY (Do not abbreviate) — FCI ☐

MNA 9 MOTHER'S NAME AT HER BIRTH — First | Middle | Last (Her maiden name)

FNA FATHER'S NAME — First | Middle | Last

PHO 10
a Has a Social Security number card ever been requested for the person listed in item 1? ☐ YES(2) ☐ NO(1) ☐ Don't know(1)

b Was a card received for the person listed in item 1? ☐ YES(3) ☐ NO(1) ☐ Don't know(1)

▶ IF YOU CHECKED YES TO A OR B, COMPLETE ITEMS C THROUGH E; OTHERWISE GO TO ITEM 11.

SSN c Enter the Social Security number assigned to the person listed in item 1 ☐☐☐-☐☐-☐☐☐☐

NLC d Enter the name shown on the most recent Social Security card issued for the person listed in item 1

PDB e Date of birth correction (See instruction 10 on page 2) ▶ MONTH | DAY | YEAR

DON 11 TODAY'S DATE ▶ MONTH | DAY | YEAR

12 Telephone number where we can reach you during the day. Please include the area code ▶ HOME | OTHER

ASD WARNING: Deliberately furnishing (or causing to be furnished) false information on this application is a crime punishable by fine or imprisonment, or both.

IMPORTANT REMINDER: WE CANNOT PROCESS THIS APPLICATION WITHOUT THE REQUIRED EVIDENCE. SEE PAGE 1.

13 YOUR SIGNATURE

14 YOUR RELATIONSHIP TO PERSON IN ITEM 1 ☐ Self ☐ Other (Specify) _____

WITNESS (Needed only if signed by mark "X")

WITNESS (Needed only if signed by mark "X")

DO NOT WRITE BELOW THIS LINE (FOR SSA USE ONLY)

DTC (SSA RECEIPT DATE) | NPN | DOC

NTC | CAN | BIC | IDN | ITV ☐ MANDATORY IN PERSON INTERVIEW CONDUCTED

TYPE(S) OF EVIDENCE SUBMITTED

SIGNATURE AND TITLE OF EMPLOYEE(S) REVIEWING EVIDENCE AND/OR CONDUCTING INTERVIEW

DATE

DATE

DCL

Form SS-5 (11-86)
5/84, 1/85 and 8/85 editions may be used until supply is exhausted

3

Major Milestones in SSN Application Process

Time frames/milestone	Application/issuance procedures
November 1936-June 1937	Applicants required to complete a simple form and received cards with no evidence required at 46,000 post offices.
July 1937-October 1971	Same procedure, but done at SSA field offices.
November 1971	Applicants age 55 and over required to provide simple evidence of identity.
March 1972	Applications taken at field offices, but issuance of original cards transferred to a central point, SSA headquarters. Replacement cards still issued at field offices.
May 1973	Number issuance and application data computerized.
April 1974	Foreign-born applicants (any age) and U.S.-born applicants 18 and over required to prove age, identity, and citizenship or alien status.
May 1978	All applicants for original cards and replacements required to prove identity. Initial applicants over 18 required to have a face-to-face interview.
July 1982	Replacement card stock removed from SSA field offices; all issuance centralized at SSA headquarters.

Private Sector Companies Contacted

American Banknote Company
New York, New York

Drexler Technology Corporation
Mountain View, California

First Data Resources, Incorporated
Alexandria, Virginia

Identicard Systems Incorporated
Lancaster, Pennsylvania

Jeffries Banknote Company
Los Angeles, California

Life Card International, Incorporated
Towson, Maryland

Light Signatures Incorporated
Greenbelt, Maryland

Master Card International
New York, New York

Micro Card Technologies Incorporated
Dallas, Texas

NEC Information Systems Incorporated
Washington, D.C.

Smart Card International
New York, New York

Smart Card Systems
Cherry Hill, New Jersey

Thorn EMI Malco Incorporated
Owings Mills, Maryland

United States Banknote Company
Philadelphia, Pennsylvania

Visa International
San Francisco, California

Comments From the Department of Justice

U.S. Department of Justice

JAN 19 1988

Washington, D.C. 20530

Mr. William J. Anderson
Assistant Comptroller General
General Government Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Anderson:

This letter responds to your request to the Attorney General for the comments of the Department of Justice on your draft report entitled "Immigration Control" A New Role for the Social Security Card." At a meeting held with representatives of the General Accounting Office (GAO), the Department was requested to provide written comments on the report's recommendations. Our comments are set forth below after each of GAO's recommendations.

GAO Recommendation in Chapter 2: Employer Verification of Employment Eligibility is Impractical

GAO recommends that the Attorney General--in studying the adequacy of the employment verification system--consider reducing the number of employment eligibility documents to the maximum extent possible, and specifically consider the option of making the social security number (SSN) card the only authorized employment eligibility document. If the Attorney General concludes that the number of employment eligibility documents under the Immigration Reform and Control Act of 1986 (IRCA) should be reduced, GAO also recommends the Attorney General study the potential impact of such a change on requests for replacement SSN cards.

Immigration and Naturalization Service (INS) Comments:

INS is already studying ways of reducing the number of employment authorization documents which may be used. Although this study has not as yet included the option of making the SSN card the only such document used, INS has no objection to participating in such an expanded study. The expanded study should cover all of the advantages and disadvantages, many of which are not covered in the GAO report. INS' major concerns with the proposal to make the SSN card the only authorized employment eligibility document are the ease with which existing cards can be counterfeited and the potential impact the change would have on the Social Security Administration's (SSA) record system.

GAO Recommendations in Chapter 3: Support Documents - A Basic Problem Allowing Individuals to Obtain SSN Cards Fraudulently

GAO recommends that the Secretary of the Department of Health and Human Services (HHS) direct the Commissioner of SSA to experiment with increased document verification to determine the extent of fraud and the benefits of additional document verification.

GAO also recommends that the Secretary of HHS and the Attorney General develop a plan for the enumeration of aliens which would provide that INS certify to the eligibility of aliens for a SSN card.

INS Comments:

INS has no objection to SSA experimenting with increased document verification. INS is also willing to study plans for the enumeration of aliens as stated; however, we believe the study should incorporate other less costly alternatives to having INS certify an alien's eligibility on a SSN application, such as enhanced use of the Systematic Alien Verification for Entitlements (SAVE) program.

GAO Recommendation in Chapter 4: SSN Cards Are Vulnerable to Fraudulent Use

GAO recommends that the Secretary of HSS and the Attorney General develop a plan for annotating SSN cards for aliens who are authorized to work or be in this country on a temporary basis.

INS Comments

INS has staff officers who have ongoing liaison with social security personnel and are involved in discussions on this and other related issues. INS has no objection to intensifying these discussions in accordance with the GAO recommendation.

GAO Recommendation in Chapter 5: Options For Making the SSN Card More Counterfeit-Resistant

GAO recommends that the Secretary of HHS direct the Commissioner of SSA to secure new and replacement SSN cards against the threat posed by color copiers.

GAO also recommends that the Attorney General and the Secretary of HHS study the cards confiscated from illegal aliens to identify the extent and methods employed to obtain and use SSN cards.

INS Comments:

INS favors enhancement of the security features of the SSN card, but believes the threat posed by color copiers is only a small part of the problem. An analytical study of the SSN cards confiscated from illegal aliens should give a clearer picture of the nature and scope of the problem. INS is willing to coordinate efforts with SSA to gather and study intelligence obtained from aliens and others who purchased false or altered SSN cards from counterfeiters or who otherwise fraudulently used valid SSN cards to circumvent IRCA requirements.

* * * * *

A major concern the Department has with the draft report is the assertion that employer sanctions would not be effective. At a November 20, 1987, meeting, this concern was clearly conveyed to GAO representatives and we were advised that based on the discussion, revisions would be made to the draft report.

We appreciate the opportunity to provide comments on the report while in draft form. Should you have any questions concerning our response, please feel free to contact me.

Sincerely,

Harry H. Flickinger
Assistant Attorney General
for Administration

Comments From the Department of Health and Human Services

DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Inspector General

Washington, D.C. 20201

FEB

Mr. Richard L. Fogel
Assistant Comptroller General
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Fogel:

The Secretary asked that I respond to your request for the Department's comments on your draft report, "Immigration Control: A New Role for the Social Security Card." The enclosed comments represent the tentative position of the Department and are subject to reevaluation when the final version of this report is received.

We appreciate the opportunity to comment on this draft report before its publication.

Sincerely yours,

Richard P. Kusserow
Inspector General

Enclosure

COMMENTS OF THE DEPARTMENT OF HEALTH AND HUMAN SERVICES ON THE GENERAL ACCOUNTING OFFICE DRAFT REPORT, "IMMIGRATION CONTROL: A NEW ROLE FOR THE SOCIAL SECURITY CARD"

General Comments

We have reviewed this General Accounting Office (GAO) draft report and find the thrust of the report highly supportive of our program administration and policy objectives. Prepared in compliance with a provision of the Immigration Reform and Control Act of 1986 (IRCA), this GAO report: (1) explores actions that could be taken to reduce the potential for fraudulently using and obtaining a Social Security number (SSN) card, and (2) identifies the technological alternatives for making the card more resistant to counterfeiting. The data and perspective presented will play a significant role as work continues to insure the integrity of the SSN issuance process and to successfully implement the alien legalization process. The issues raised in the report including alien enumeration, financing the cost of SSN card replacements, possible technological enhancements to the SSN card, and the SSN card as a national identifier must be debated and resolved.

While our comments reflect agreement with most of GAO's recommendations, there is a legal concern that will prevail as we consider options to improving the enumeration process. As is pointed out on page 5 of the Executive Summary and pages 13 and 14 of the text of the report, section 274 A(d)(3)(E) of the Immigration and Nationality Act (INA), added by section 101(a)(1) of IRCA, provides that any major changes in the SSN card for purposes of IRCA are to be financed from general revenues. Implementing many of the suggestions in the draft report would raise this funding issue. For example, costs will be incurred if SSN cards are annotated to show time limits for alien work authorization, as suggested at pages 34 and 41 of this draft. Similarly, the options to reduce fraudulent use of SSN cards discussed at pages 35 through 40 of the draft, and the options for making the SSN card more counterfeit-resistant discussed in chapter 5 would also require additional costs.

Now on p. 9.

Now on pp. 30 and 34.

Now on pp. 31 to 33.

In addition to this funding issue, we also recognize that much of what we do (or plan to do) to enhance the integrity of the SSN card results from our normal program administration and cannot be attributed to IRCA exclusively. Drawing this fine distinction as to implement changes in the enumeration process will add to our accounting and operational responsibilities.

General Accounting Office (GAO) Recommendations

The Attorney General should--in studying the adequacy of the employment verification system--consider reducing the number of employment eligibility documents to the maximum extent possible, and specifically consider the option of making the Social Security card the only authorized employment eligibility

document. If the Attorney General concludes that the number of employment eligibility documents under IRCA should be reduced, the Attorney General should study the potential impact of such a change on requests for replacement Social Security cards.

Department Comments

We do not oppose a study of this issue; however, we believe that it is important to recognize that requiring that the Social Security card be the only document used under IRCA for verification of employment eligibility would increase various "pressures" on the card--ranging from increased requests for replacement to further calls for making the card more "counterfeit-proof." Any such study should take into account SSA's concern that the Social Security card not become a national identifier as well as the cost and effectiveness of mass reissuance of the card. Additionally, given the impact any resulting decisions would have on SSA, we believe that SSA participation in the recommended study is essential.

Matter For Consideration By The Congress

Congress may wish to consider whether the cost of providing SSN replacement cards generated as a result of IRCA should be paid for either from appropriated funds or by fees from those requesting the cards, rather than the Social Security trust funds.

Department Comments

This recommendation clearly brings into focus the trust fund reimbursement issue as discussed in our general comments and raises the question of how to determine whether or not issuance of a replacement card is "due to" IRCA. In advocating that a study be conducted on the need for the various employment eligibility verification documents now used, GAO notes that reducing the number of these documents could significantly increase the demand for SSN replacement cards. Because IRCA does not specify whether the trust funds should absorb the additional costs of issuing replacement cards and congressional intent is not clear on this issue, GAO makes this recommendation for congressional consideration of the matter. We have no objection to GAO's recommendation that the Congress consider this issue.

GAO Recommendation

The Secretary of HHS should direct the Commissioner of Social Security to experiment with increased document verification to determine the extent of fraud and the benefits of additional document verification.

Department Comments

We are confident that, on the whole, SSA's verification procedures for enumeration are adequate; in fact, all our detailed studies reflect this. However, we also know that there are "pockets of problems" (some related to document verification) that still require resolution. In line with this GAO recommendation, we are committed to further study and corrective action in this area. Our current view holds that enumeration at birth is probably the best solution to the problems associated with evidence and document verification. Towards this end, SSA is planning to expand arrangements for voluntary enumeration at birth to all jurisdictions where feasible.

GAO Recommendation

The Secretary of HHS and the Attorney General should develop a plan for the enumeration of aliens which would provide that INS certify to the eligibility of aliens for an SSN card.

Department Comments

We are in general agreement with this recommendation. However, we believe certain qualifiers are in order. We were able to set up the special process for enumerating legalization applicants through INS because these individuals are all required to have a face-to-face interview with INS examiners and to present evidence similar to that required by SSA. We are not certain that this is true for all categories of resident and nonresident aliens. For some, their only contact with INS may be a cursory review at a foreign service post. Also, most aliens who need replacement cards do not have to go to INS. We suggest the recommendation allow flexibility to develop a process that may include INS certification for some, but not necessarily all, categories of alien applicants. In conjunction with this, we support continued INS action, as discussed by GAO on page 11, to reduce the number

Now on p. 15.

of documents they issue to aliens to convey work authority. Use of a single standard work card in addition to the normal INS entry document would be of great benefit to both SSA employees and employers in reviewing documentation.

GAO Recommendation

The Secretary of HHS and the Attorney General should develop a plan for annotating SSN cards for aliens who are authorized to work or be in this country on a temporary basis.

Department Comments

GAO finds that a continuing vulnerability in the SSN card issuance process allows certain aliens to obtain a regular SSN card although their work authorization is limited by INS to a certain period of time. GAO concludes that SSA's current issuance procedures could be modified to minimize this vulnerability by putting an expiration date on the SSN card or by placing a legend on the card stating in effect that it is valid for employment purposes only if accompanied by an INS document that specifically authorizes employment.

In general, we support the recommendation to develop a plan for annotating SSN cards for aliens who are authorized to work or be in this country on a temporary basis. We do not favor the placement of an expiration date on the SSN cards. As the report points out, alien status and work authority can change frequently necessitating numerous requests for duplicate cards reflecting current work eligibility. We support a more general approach where a legend is placed on the card stating it is valid for employment purposes only if accompanied by an INS document that clearly indicates work authorization. Aliens are required to carry their INS documents with them at all times and they should be available for review with the SSN card.

In order for this recommendation to be effective, the types of INS documents should be limited to "temporary" and "permanent," made more resistant to fraud, and clearly indicate whether work is authorized or not.

Additionally, as discussed above, annotating the SSN card in this fashion could constitute a "major change" under IRCA and, therefore, would have to be preceded by advance notice to Congress.

GAO Recommendation

The Secretary of HHS should direct the Commissioner of Social Security to secure new and replacement SSN cards against the threat posed by color copiers.

Department Comments

We agree and have already taken action to address the color copier threat. All new and replacement SSN cards will contain the new security feature. SSA began to use the revised forms in early January 1988.

On a conceptual level, we recognize the importance of high technology in advancing various alternatives for making the SSN card more secure. We plan to continue to monitor new, developing technologies, such as the "smart card," and to actively investigate their potential for future use in Social Security program administration.

GAO Recommendation

The Attorney General and the Secretary of HHS should study the cards confiscated from illegal aliens to identify the extent and methods employed to obtain and use SSN cards.

Department Comments

We agree that a study of this nature could provide insight into typical fraudulent methods and documents used to obtain SSN cards. The Department's Office of Inspector General will work with the Attorney General in conducting a joint study.

Other Comments

Now on p. 10.

Chapter 1, page 4, paragraph 2
The sentence starting at line 6 should read, "Today, however, because of the increased use of the card as an identifier to obtain a card and number, an application must be submitted along with evidence of age, identity, and citizenship or alien status."

Now on p. 10.

Chapter 1, page 4, paragraph 3
The sentence starting at line 2 should read, "Additionally, SSA issues non-work SSN cards to legal aliens who are not authorized to work." Except in certain benefit claim situations, we do not issue non-work numbers to illegal aliens.

Now on pp. 16 and 27.

Chapter 2, page 13, last line and Chapter 3, page 32, line 6
The report states on these pages that SSA estimates it costs about $5.90 to process each SSN application. This figure should be corrected. SSA's data indicate a unit cost of $7.25 per SSN card application for fiscal year 1987.

Appendix III
The May 1978 milestone is not quite accurate. Applicants for replacement cards were required to present evidence of identity only.

*U.S. G.P.O. 1988-201-749:80007

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